

EXHIBIT G

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TRAFFICSCHOOL.COM, INC., a)
California corporation;)
DRIVERS ED DIRECT, LLC, a)
California limited liability)
company,)

Plaintiffs,)
)

vs.)

Case No. CV
06-7561 PA (CWx)

EDRIVER, INC., ONLINE GURU,)
INC., FIND MY SPECIALIST,)
INC., AND SERIOUSNET, INC.,)
California corporations;)
RAVI K. LAHOTI, an)
individual; DOES 2 through)
10,)

CONFIDENTIAL

Defendants.)

Deposition of STEVE MORETTI

taken at 221 North Figueroa Street, Suite 1200

Los Angeles, California, commencing at

10:33 a.m., Friday, June 29, 2007, before Nila

Ganahl, CSR No. 4982.

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PAGES 48-62; 73, 215-232; 249-264; AND 308-315

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1 MR. DeCARLO: By the way, Mr. Daucher, we got
 2 some financial documents, but it's only related to
 3 certain categories and it was only gross revenues. Are
 4 you planning on giving us --
 5 MR. DAUCHER: I'm not going to meet and confer
 6 on the record.
 7 MR. DeCARLO: I'm just asking you.
 8 MR. DAUCHER: I'm not going to meet and confer
 9 on the record.
 10 MR. DeCARLO: Are you planning on giving us
 11 cost --
 12 MR. DAUCHER: I'm not here to answer questions
 13 today. Are you going to answer my questions?
 14 MR. DeCARLO: Sure.
 15 MR. DAUCHER: When are you going to produce one
 16 document in this case?
 17 MR. DeCARLO: You'll have to ask somebody else
 18 about that, I'm not dealing with the document
 19 production. Well, there's a reason why. I have the 30
 20 B (6) witness in front of me and I don't have any cost
 21 data or profit data, and unless --
 22 MR. DAUCHER: Show me where in the 30 B (6)
 23 designation it talks about cost, because I don't see
 24 it. All I see is Category 9, gross receipts from sales
 25 commissions or other revenue generated from DMV.org.

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1 If you can show me something where I should have
 2 prepared him for cost, then we'll talk.
 3 MR. DeCARLO: And you don't want to answer the
 4 question about whether you're going to give me cost
 5 data?
 6 MR. DAUCHER: I'm not going to meet and confer
 7 on the record.
 8 MR. DeCARLO: Why?
 9 MR. DAUCHER: Want to go off the record and
 10 talk about it?
 11 MR. DeCARLO: Sure, let's go off the record for
 12 a second.
 13 (There was a discussion off the record.)
 14 BY MR. DeCARLO:
 15 Q All right. With regards to traffic school and
 16 Drivers Ed, you don't provide those -- Online Guru is
 17 not a provider of traffic school or Drivers Ed?
 18 A We don't provide fulfillment of those
 19 products.
 20 Q The fulfillment is done by your referral
 21 partners?
 22 A Correct.
 23 Q How many different fulfillment partners do you
 24 have for traffic school?
 25 A Just for traffic school?

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1 Q Yes.
 2 A I believe we have five.
 3 Q Okay. Who are they, can you name them?
 4 A ContinuedEd.com, which also does business as
 5 Drive Safely.
 6 Q ContinueEd.com owns I Drive Safely?
 7 A Yeah.
 8 Q Okay.
 9 A American Safety Classes.
 10 Q Okay.
 11 A Driving University.
 12 Q Okay.
 13 A Online Traffic School and the fifth one, can't
 14 remember off the top of my head.
 15 Q Okay. Every state has different requirements
 16 with regard to traffic school requirements -- that's a
 17 bad question.
 18 Do you know if every state has different
 19 requirements for what constitutes a valid traffic
 20 school course?
 21 A I'm aware that states have variations state to
 22 state.
 23 Q Does Online Guru keep up to date on what those
 24 requirements are?
 25 A We try to.

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1 Q How do you do that?
 2 A Through external writers and researchers.
 3 Q You have people on staff whose job it is to
 4 research the requirements of the respective state DMVs?
 5 A Free-lance.
 6 Q They're outsiders who you pay to do it?
 7 A Correct.
 8 Q They're not employees. Okay.
 9 When you retain an outside fulfillment
 10 company -- or not retain, but when you make a deal with
 11 an outside fulfillment company, what, if anything --
 12 well, is there a process that you go through to
 13 ascertain the qualifications of the referral source of
 14 the fulfillment company?
 15 A I wouldn't say we do -- go through any
 16 official background check per se, but we do business
 17 with companies we feel are reputable companies in the
 18 space that are also --
 19 Q See, you used that word again.
 20 A -- that are also -- that are also marketing
 21 online.
 22 And similar to your question earlier on
 23 background checks, our partners have a responsibility
 24 to comply with all applicable laws within the given
 25 state that we're advertising.

16 (Pages 74 to 77)

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